

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION

In re:	§	Lead Case No. 21-60162-rbk
	§	Second Case No. 21-60163-rbk
DARYL GREG SMITH and	§	
CANADIAN RIVER RANCH, LLC	§	Chapter 11
	§	
Debtors.	§	(Jointly Administered Under
	§	Case No. 21-60162-rbk)

**DEBTORS' AMENDED WITNESS AND EXHIBIT
LIST FOR SEPTEMBER 22, 2021 HEARING**

TO THE HONORABLE RONALD B. KING, CHIEF U.S. BANKRUPTCY JUDGE AND TO ALL PARTIES:

Daryl Greg Smith (“Smith”) and Canadian River Ranch, LLC (“CRR”, with Smith, the “Debtors”) hereby submit this Amended Witness and Exhibit List in support of the hearing to held on **September 22, 2021, at 11:00 a.m.** (prevailing Central Time) (the “Hearing”).

WITNESSES

The Debtors reserve all rights to call any or all of the following as witnesses at the Hearing, including but not limited to by affidavit, declaration or proffer.

1. Daryl Greg Smith;
2. Any witness called or designated by any other party; and
3. Any rebuttal witnesses, as appropriate.

EXHIBITS

The Debtors reserve all rights to introduce and/or request judicial notice of any or all of the following Exhibits as evidence at the Hearing, each as may be amended, and expressly including any filed responses thereto, and any exhibits, schedules, addenda, and any and all other attachments or amendments thereto and thereof:

No.	Description	MARKED	OFFERED	OBJECT	ADMIT
A.	<i>Listing Agreement – Exclusive Right to Sell</i> (Aug. 18, 2020) [Dkt. No. 30, Proposed Order, Ex. 1]				
B.	<i>Retention Agreement</i> (Aug. 1, 2021) [Dkt. No. 155, Ex. B]				
C.	<i>Declaration of Darren Keith Reed in Support of Application to Approve Retention and Employment of Ranch Masters as Real Estate Brokers for the Trustee</i> [Dkt No. 155, Ex. E]				
D.	<i>Partnership Agreement of Canadian River Ranch Partners</i> (Sept. 9, 2014)				
E.	<i>Special Warranty Deed</i> , Bosque County, Texas (Feb. 7, 2020)				
F.	Daryl Greg Smith's <i>Amended Schedules and Statement of Financial Affairs</i> [Dkt. No. 39]				
G.	Canadian River Ranch, LLC's <i>Amended Schedules and Statement of Financial Affairs</i> [Dkt. No. 41]				
H.	<i>Material Lease Agreement</i> (Nov. 20, 2016), by and between Canadian River Ranch, LLC and Rock Quarries LLC				
I.	Any and all Motions, Notices, pleadings, and other docket items filed of record in the Bankruptcy Case				
J.	Any and all exhibits designated by any other party				
K.	Any and all other exhibits as may be appropriate for rebuttal or impeachment purposes				

RESPECTFULLY SUBMITTED this 21st day of September, 2021.

MUNSCH HARDT KOPF & HARR, P.C.

By: /s/ Davor Rukavina
Davor Rukavina, Esq.
Texas Bar No. 24030781
Thomas D. Berghman, Esq.
Texas Bar No. 24082683
500 North Akard St., Ste. 3800
Dallas, Texas 75201
Telephone: (214) 855-7500
Facsimile: (214) 978-4375
drukavina@munsch.com
tberghman@munsch.com

ATTORNEYS FOR THE DEBTORS

CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on the 21st day of September 2021, he personally caused true and correct copies of the foregoing Amended Witness and Exhibit List to be served by electronic transmission through the Electronic Case Filing System for the United States Bankruptcy Court for the Western District of Texas to each of the below parties.

Eboney Delane Cobb on behalf of Creditor Whitney ISD
ecobb@pbfc.com, rgleason@pbfc.com

Ruben Rene Escobedo on behalf of Interested Party Darren Keith Reed
rene.escobedo@rre-law.com

Mark B. French on behalf of Creditor Mark Cochran
mark@markfrenchlaw.com, Sarah@markfrenchlaw.com

Edwin Paul Keiffer on behalf of Creditor Karen Annette Smith
pkeiffer@romclaw.com, bwallace@romclaw.com

Edwin Paul Keiffer on behalf of Defendant Karen Annette Smith
pkeiffer@romclaw.com, bwallace@romclaw.com

Scott D. Lawrence on behalf of Creditor Farm Credit of Western Oklahoma
scott.lawrence@wickphillips.com, brenda.ramirez@wickphillips.com

Tara LeDay on behalf of Creditor Texas Taxing Authorities
tleday@mvalaw.com, vcovington@mvalaw.com, alocklin@mvalaw.com,
bankruptcy@mvalaw.com, pbowers@mvalaw.com, vjames@mvalaw.com

Gregory S. Milligan
gmilligan@harneypartners.com

William R Nix, III on behalf of Trustee Gregory S. Milligan
trip.nix@wallerlaw.com, sherri.savala@wallerlaw.com

Mark J. Petrocchi on behalf of Creditor Griffith, Jay & Michel, LLP
mpetrocchi@lawgjm.com, mkidd@lawgjm.com

Steve Stasio on behalf of Attorney Andrew F. Stasio, Jr.
steve.stasio@stasiolawfirm.com

Marc W. Taubenfeld on behalf of Creditor Boomer State Outdoors, LLC
mtaubenfeld@mcsllaw.com, scotton@mcsllaw.com

David G. Tekell on behalf of Creditor Tekell and Tekell LLP
david@tekell-law.com, carolyn@tekell-law.com

Shane P. Tobin on behalf of U.S. Trustee United States Trustee - WA12
shane.p.tobin@usdoj.gov, brian.r.henault@usdoj.gov, Carolyn.Feinstein@usdoj.gov,
carey.a.tompkins@usdoj.gov, roxana.peterson@usdoj.gov, gary.wright3@usdoj.gov,
deborah.a.bynum@usdoj.gov, aubrey.thomas@usdoj.gov

United States Trustee - WA12
ustpreion07.au.ecf@usdoj.gov

Morris D. Weiss on behalf of Trustee Gregory S. Milligan
morris.weiss@wallerlaw.com, sherri.savala@wallerlaw.com,
annmarie.jezisek@wallerlaw.com

Additionally, appropriately marked copies in an electronic format of each of the Exhibits listed in the Amended Witness and Exhibit List was also provided to each of the below parties via e-mail. Any other parties wishing to receive copies of the Exhibits can do so by contacting counsel for the Debtors.

Edwin Paul Keiffer on behalf of Creditor Karen Annette Smith
pkeiffer@romclaw.com, bwallace@romclaw.com

Gregory S. Milligan
gmilligan@harneypartners.com

William R Nix, III on behalf of Trustee Gregory S. Milligan
trip.nix@wallerlaw.com, sherri.savala@wallerlaw.com

Morris D. Weiss on behalf of Trustee Gregory S. Milligan
morris.weiss@wallerlaw.com, sherri.savala@wallerlaw.com,
annmarie.jezisek@wallerlaw.com

Shane P. Tobin on behalf of U.S. Trustee United States Trustee - WA12
shane.p.tobin@usdoj.gov, brian.r.henault@usdoj.gov, Carolyn.Feinstein@usdoj.gov,
carey.a.tompkins@usdoj.gov, roxana.peterson@usdoj.gov, gary.wright3@usdoj.gov,
deborah.a.bynum@usdoj.gov

By: /s/ Thanhhan Nguyen
Thanhhan Nguyen, Esq.